

1 Christopher D. Jaime, Esq., Nev. Bar #4640
2 Maupin, Cox & LeGoy
3 4785 Caughlin Parkway
4 P.O. Box 30000
5 Reno, Nevada 89520
6 Telephone: (775) 827-2000
7 Facsimile: (775) 827-2185
8 E-mail: cjaime@mclrenolaw.com
9 Attorneys for Secured Creditor
10 Milton M. Dambacher

11 UNITED STATES BANKRUPTCY COURT

12 DISTRICT OF NEVADA

13 IN RE:

Case No: BK-13-50194-btb
(Chapter 12)

14 PATRICK MCCAULEY,
15 dba GC LIVESTOCK, LLC;
16 PATRICIA MCCAULEY,

**EX PARTE APPLICATION PURSUANT
TO LOCAL RULE 9014(e) FOR LEAVE
TO FILE OMNIBUS OBJECTION AND
OPPOSITION IN EXCESS OF PAGE
LIMIT**

17 Debtors.

Hearing Date: July 16, 2013
Hearing Time: 3:00 p.m.

18 _____ /
19 Secured Creditor Milton M. Dambacher, Trustee, Dambacher 1987 Family Trust
20 ("Dambacher"), hereby requests leave to file its *Omnibus Objection and Opposition by Milton M.*
21 *Dambacher, Trustee, to Chapter 12 Plan, Valuation Motion, Motion Estimate Dambacher Claim,*
22 *and Motion to Confirm; Supplement to Debtor's Valuation Motion* ("Objection and Opposition")
23 in excess of the 20-page limit prescribed by Local Rule 9014(e). For the reasons set forth below,
24 Dambacher requests leave to file the Objection and Opposition not in excess of 35 pages, exclusive
25 of exhibits.
26

1 Local Rule 9014(e) provides, in part, that “briefs and points and authorities in support of, or
2 in response to, motions are limited to 20 pages.” Under the Local Rules and common practice in this
3 District, the Court may waive this limitation. In the present case, leave to file in excess of the 20-
4 page limit of LR 9014(e) is necessary due to the nature, significance, and number of issues addressed
5 in the Objection and Opposition. Additionally, for sake of clarity, continuity, and the Court’s
6 convenience all arguments are presented in a single document rather than several separate
7 documents. Therefore, Dambacher respectfully requests that the Court grant this *ex parte* application
8 and expand the page limit of the Objection and Opposition from 20 pages to not in excess of 35
9 pages.
10
11

12 DATED this 5th day of July, 2013.

MAUPIN, COX & LEGOY

13
14 By /s/ Christopher D. Jaime

15 Christopher D. Jaime, Esq., #4640
16 Attorneys for Creditor Milton M. Dambacher
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I certify under penalty of perjury that I am an employee of MAUPIN, COX & LeGOY, Attorneys at Law, and that on the date indicated below, I served the foregoing document(s) described as follows:

**EX PARTE APPLICATION PURSUANT TO LOCAL RULE 9014(e)
FOR LEAVE TO FILE OMNIBUS OBJECTION AND
OPPOSITION IN EXCESS OF PAGE LIMIT**

on the party(s) set forth below by:

_____ Placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Reno, Nevada, postage paid, following ordinary business practices, addressed as follows:

XXX Electronic filing via the U.S. Bankruptcy Court CM/ECF filing system, to all those persons listed on the United States Bankruptcy Court ECF Confirmation Sheet.

DATED this 5th day of July, 2013.

/s/ Karen Bernhardt
Employee